Rick Buell - Cal-ISO Comments on the CEC Initial Draft Regulations (Docket Number: 01-SIT-1)

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Rick,

The Cal-ISO has reviewed the "Initial Draft Modifications to Siting Regulations" that were distributed with the Siting Committee's June 26, 2001 workshop notice, and we only have one comment on these draft modifications.

Regarding the proposed changes to Section 1714.5 (d), the Cal-ISO supports the CEC Staff's comment requesting that this section not be added to the regulations. Even though this proposed section would not directly apply to the Cal-ISO (since we are not a State Agency), we believe that this section could unnecessarily restrict Staff in evaluating the impacts of a proposed project. The Cal-ISO currently enjoys an excellent working relationship with the CEC staff and we have always agreed on the reliability impacts caused by and the appropriate mitigation measures required for the addition of new projects to the Cal-ISO Controlled Grid. However, the Cal-ISO believes that as an independent party, the CEC staff should have the freedom to determine the appropriate mitigation measures based on their independent evaluation of a project's environmental impact and not be restricted to only considering whether a State Agency's comments violate applicable State or Federal law.

Thank you for allowing us the opportunity to comment on the "Initial Draft Modifications to Siting Regulations".

Respectfully Submitted,

Peter Mackin

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